

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

UNITED STATES OF AMERICA,) CR. NO. 3:25-54
)
)
)
v.) MOTION FOR DISCOVERY AND
)
)
MOHAMMAD EBRAHIM TORKI) INSPECTION
HARCHEGANI,)
)
DEFENDANT.)

NOW COMES the defendant, **Mohammad Ebrahim Torki Harchegani**, through his undersigned attorney, does hereby move the Court for discovery and inspection of the following:

1. Any relevant written or recorded statements made by the defendant, or copies thereof, within the possession, custody or control of the Government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the Government;
2. The substance of any oral statement which the Government intends to offer in evidence at the trial made by the defendant;
3. The prior criminal record of the defendant;
4. All books, papers, documents, photographs or tangible objects which are in the possession, custody or control of the Government, and are relevant to this case, including any handwritten notes taken by any investigating agents;
5. The results or reports of physical or mental examinations, of scientific tests or experiments, or copies thereof, which are within the possession, custody control of the Government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the Government mended;
6. Pursuant to Fed. R. Crim. P. 16(a)(1)(G), a written summary of testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial, including the witnesses' opinions, the basis and the reasons thereof, and the witnesses' qualifications;
7. All evidence favorable to the defendant, or which would be helpful in the preparation of a defense or in mitigation of punishment. This includes, but is not limited to, the following:

- (a) All information relevant to the credibility of any Government witness;
- (b) All information concerning the conduct, character and reputation of any such witness which is relevant to his or her truthfulness or untruthfulness;
- (c) The criminal record of such witness, including specifically, any prior conviction of a crime punishable by death or imprisonment in excess of one year or which involved dishonesty or false statement;
- (d) The substance of any agreement, or proposed agreement, either oral or written, made in the name of the Government of the United States to any Government witness, the subject of which deals either directly or indirectly with promise of favored treatment or leniency in return for either pleas of guilty, nolo contendere or favorable testimony in this case or any other criminal or civil litigation or sentencing procedure;
- (e) All evidence tending to show that any acts or conduct by the defendant were done without criminal intent;
- (f) This request specifically includes any information which could show that at the time of any alleged act, that the defendant, **Mohammad Ebrahim Torki Harchegani**, was neither present, mentioned or involved directly or indirectly;
- (g) All names and present addresses of persons who have any knowledge of the existence of any evidence which might be relevant to acts charged as a crime in the Indictment against the defendant, including all persons who (a) will be witnesses for the Government upon the trial of this case, or (b) will not be called as witnesses by the Government; and
- (h) The transcript of testimony of any and all persons who testified before the Grand Jury in this case.
- (i) All statements of witnesses producible under Title United States Code, Section 3500, the Jenks Act, at least seventy-two (72) hours prior to trial;

(j) Pursuant to the provisions of Title 18, United States Code, Section 2518(9):

(a) All records relating to intercepted wire or oral communications and/or any evidence discovered therefrom.

Respectfully submitted,

s/ SUHA S. NAJJAR

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